

**ATTACHMENT II-4**  
**PERSONNEL TRAINING PLAN**



**TABLE OF CONTENTS**  
**PERSONNEL TRAINING PLAN**

1.0	INTRODUCTION.....	1
2.0	OVERVIEW OF RCRA TRAINING PROGRAM .....	1
2.1	RCRA Personnel Training Requirements .....	1
2.2	"Facility Personnel" Defined .....	1
2.3	Training Records .....	2
2.4	Off-Site Training.....	2
2.5	Safety-Kleen-Sponsored Training Courses .....	3
3.0	CONTENT OF TRAINING COURSE MODULES.....	3
3.1	Company Orientation (General).....	3
3.2	Chemical Terminology, Toxicology, and Handling (General).....	3
3.3	Operating Practices Summary .....	4
3.4	Contingency Plan.....	4
3.5	Respiratory Equipment.....	5
3.6	Miscellaneous Topics.....	5
3.7	Instructor Qualification .....	5
4.0	IMPLEMENTATION OF TRAINING PROGRAM .....	5

APPENDIX 1 - TYPICAL GRASSY MOUNTAIN TRAINING MODULES

APPENDIX 2 - TRAINING MATRIX



## **1.0 INTRODUCTION**

The Grassy Mountain facility training program shall enable facility personnel to understand the processes and materials with which they are working and the safety and health hazards associated with those processes and materials. The training program shall also instruct facility personnel in the proper procedures for preventing and responding effectively to emergency situations. And where appropriate, the training program shall provide knowledge for using, inspecting, repairing, and replacing facility emergency equipment. Regular instruction in safety shall be provided through safety meetings and drills. The goal is to have personnel trained to perform their specific job functions in an efficient, safe and proper manner. This Plan shall describe only that training which is required under the GMF RCRA Permit; other training is provided (e.g., OSHA or USDOT) which is not described by this Plan. Note however, that OSHA or USDOT classes can fulfill the requirements of this plan.

## **2.0 OVERVIEW OF RCRA TRAINING PROGRAM**

Facility personnel shall obtain "general" and "job position specific" hazardous waste management training prior to working unsupervised in any job position that requires managing hazardous waste. This training shall be accomplished within six months of employment. Additional job specific training shall be given within six months of reassignment. Facility personnel participate in an annual review of general training.

### **2.1 RCRA Personnel Training Requirements**

The requirements for training are contained in UDEQ R315-8.2.7 of the Utah Administrative Code. The general training provided to Grassy Mountain Facility personnel is described in Appendix 2 to this Plan. Once each calendar year, not to exceed 15 months, "refresher" training consisting of a review of the appropriate materials covered by the initial training program shall be provided.

### **2.2 "Facility Personnel" Defined**

The term "facility personnel" shall apply to persons who are employed on-site for the purpose of managing (e.g.; waste sampling, treating, or disposing...) hazardous waste. Not covered by this training program are positions such as personnel from other divisions of Safety-Kleen and consulting engineers who are not involved in the management of hazardous wastes at the site. Personnel from off-site who are involved in the management of hazardous waste at the site shall be trained in accordance with this plan unless certification of appropriate training is obtained from the contractor or the employee.



## **2.3 Training Records**

Training records shall be maintained for all facility personnel. These include the job title of the position, job position description detailing the requisite skill, education, other qualifications and a list of both general and job position specific training for an employee filling that position. Documentation that the training or job experience has been received is also included. A summary of completed required training for any individual shall be made available to the Executive Secretary upon request. Each employee's training shall be reviewed at least annually and documented in the individual's training record.

A list of waste management job positions at GMF and the name of the employee(s) filling each job shall be maintained at the facility.

Training records on current personnel shall be kept until closure of the facility; training records on former employees shall be kept for at least three years from the date the employee last worked at the facility except that personnel training records can accompany personnel transferred within the company.

## **2.4 Off-Site Training**

Training is available apart from the facility that can serve to fulfill the training required herein. In some areas, experience, college credits or one or more degrees can serve to exempt a person from further training in a given area. Should this occur, the nature of the experience and the formal education shall be documented if it is to serve as total fulfillment of a particular training need.

In some years, a person may attend an off-site seminar or training course that contains equivalent information contained in one or more of the on-site training sessions. This training can be documented by the trainee (self-certification), and used for fulfillment of the requirement for annual "refresher" training. If an employee requires annual job training, the company in addition to the off-site "refresher" shall still provide it.

Self-documentation becomes necessary when employees attend seminars that are not site sponsored and when standard methods of attendance verification are not available. Self-documentation can be accomplished by the submission of a signed and dated Certificate offered by the sponsor of the off-site seminar. In cases where a certificate is not offered, the employee shall submit a detailed outline of the seminar. The employee shall sign and date the outline. Certificates and outlines shall be kept in the employee's training record. The employee responsible for monitoring the training records for the GMF employees shall

verify that the documentation submitted from the seminar meets the requirements of self documentation, and that the topics addressed by the seminar or class meet the requirements of the facility Personnel Training Plan. The self-documentation submitted shall be signed by a facility employee trained in the Personnel Training Plan of the facility.

In summary, non-Safety-Kleen sponsored training can be utilized and documented if it meets or surpasses the training requirements contained in this plan. The training, if it is to be used as fulfillment of the requirements contained herein, shall be documented and placed in the training record following verification that the class has met the requirements of the Personnel Training Plan of the facility. This verification shall be documented in the employees training record.

## **2.5 Safety-Kleen-Sponsored Training Courses**

The goal of the training program shall be to ensure that facility personnel receive training commensurate with their specific job functions. GMF can elect to sponsor and administer portions or all of the Training Program described herein. The descriptions listed in Section 2.0 of this Plan are typical of the basic concepts administered through the Training Program, regardless of whether they are conducted by Safety-Kleen or others. These concepts can be taught as an entire training module, as part of a single module or as part of several modules. A list of training modules currently used in the Training Program is included in Appendix 2.

## **3.0 CONTENT OF TRAINING COURSE MODULES**

### **3.1 Company Orientation (General)**

All personnel, upon initial employment, shall be introduced to the company philosophy and method of operation as well as specific rules and regulations. This material shall be covered in the company overview module. Also included in the company overview module shall be a facility description, operations overview and basic office procedures.

### **3.2 Chemical Terminology, Toxicology, and Handling (General)**

Training related to chemicals and toxicology shall provide a basic understanding of relevant terminology and the inherent properties of the waste types managed on-site. Precautions to be taken in handling hazardous wastes and the reasoning for such measures shall be emphasized. Specific consideration shall be given to the procedures and practices governing the mixing of materials and prohibiting the mixing of incompatible materials which can result in undesired events.



Discussion of toxicology and inherent hazards shall be tailored to meet the types of materials treated, stored, or disposed of on-site.

This training shall be provided to those employees who are involved in the actual handling of hazardous wastes as indicated on their job description.

Various modules can be used to cover this material. Typical module titles are: Chemistry of Hazardous Materials and Wastes, Health Effects of Hazardous Wastes, Industrial Hygiene and Decontamination, Personal Protective Equipment and Clothing, and Waste Identification and Segregation. The contents of the training courses presented in Appendix 1 and 2 shall be included in the training offered even if the title of the modules or class changes.

### **3.3 Operating Practices Summary (Job Position Specific)**

All operators (e.g., those that work in the landfills, in the solidification/stabilization areas, at the drum dock, etc.) will be required to be familiar with the operating practices for their respective units. Each operator will be instructed in the permit module for his or her unit.

Procedures and actions will be discussed, and actual drills may be performed in the field.

Other personnel will be trained as needed through orientation, or review of other relevant plans.

Typical titles of modules used to cover this material are: Drum Dock Operations, Industrial Cell Operations, RCRA Cell Operations, Stabilization/Solidification, Truck Washout, TSCA Cell Operations, and Waste Sampling.

### **3.4 Contingency Plan (General and Job Specific)**

All personnel shall be required to understand the Contingency Plan to the degree that it affects them. The Contingency Plan covers response to spills, fires, releases and other emergency situations. It also discusses casualty control, evacuation, and clean-up procedures. This area of training shall include instruction in the procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment; the key parameters for automatic waste feed cut-off systems; emergency communications and alarm systems and signals; response to ground-water contamination incidents; and procedures to be followed in the event of a shutdown of operations, as applicable. The scope of this training varies with a person's job position.

Procedures and actions shall be discussed and actual drills may be performed in the field.

These periodic drills may simulate fire, explosion, or emission or discharge of hazardous materials. Reviews are conducted as deemed appropriate to maintain readiness for emergency response but at least once per year. A form is provided as part of the Site Inspection Plan (Attachment II-3) to document the annual drill.

Typical modules used to cover this topic are: Contingency Plan, Preparedness and Prevention Plan, Procedures for Using, Inspecting, Repairing and Replacing Facility Emergency Equipment, and Site Inspection.

### **3.5 Respiratory Equipment (Job Position Specific)**

For protection in atmospheres known or suspected to contain toxic substances, certain personnel shall be instructed in the care and use of respiratory protection equipment. Training stresses proper use and fit and procedures for basic inspection and maintenance. Respiratory protection procedures shall be reviewed periodically and assessed for appropriateness. For personnel who utilize a respirator as part of their job function, a fit test shall be provided to the employee to verify that the respirator is adequately protecting the employee.

Trained personnel shall perform all repairs and annual inspections of equipment when and where required. Respiratory protection training is covered by OSHA required training.

### **3.6 Miscellaneous Topics (Job Position Specific)**

Record Keeping, Site Security, Update of Regulations, and Waste Approval modules shall be taught as required by specific job descriptions.

### **3.7 Instructor Qualification**

Instructors shall be considered to be qualified to teach a module by presentation of academic credentials, a resume detailing actual past work experience, or other equivalent documents that are specific for the module that will be taught. Training courses presented by non-Safety-Kleen groups shall be considered for appropriateness and applicability and only determined to be acceptable if the module meets the objective of the GMF Personnel Training Plan.

Credentials of all instructors shall be incorporated into the operating record.

## **4.0 IMPLEMENTATION OF TRAINING PROGRAM**

Upon employment or assignment to the facility, a training file shall be created for the employee as described in section 1.3 of this plan. Reassigned employees at the facility shall have their records reviewed for training adequacy.

Lists of typical training modules taught shall be included as Appendix 1. Modules typically consist of all or parts of the basic concepts described in section 2 as well as appropriate procedures. For example, procedures related to managing hazardous waste drums at the drum dock would be included in the drum dock module. The employee can demonstrate understanding of the topics covered through written, oral or practical exams. All exams, practical, written and oral and all training, including on-the-job training shall be documented in the training record.

A matrix of minimum training requirements for each job position is found in Appendix 2.

## **APPENDIX 1**

### **TYPICAL GRASSY MOUNTAIN TRAINING MODULES**

## TYPICAL GRASSY MOUNTAIN TRAINING MODULES

DESCRIPTION	APPROXIMATE LENGTH (hr)
(Permit Sec: 2.1) <b>Company Orientation</b>	1
<ul style="list-style-type: none"> <li>a. Company Philosophy and method of operation</li> <li>b. Specific Rules and Regulations</li> <li>c. Facility Description</li> <li>d. Operations and basic office procedures</li> </ul>	
(Permit Sec: 2.2) <b>Chemical Terminology, Toxicology and Handling</b>	2
<ul style="list-style-type: none"> <li>a. Chemicals and Toxicology</li> <li>b. Handling Hazardous Wastes</li> <li>c. Procedures and Practices mixing waste</li> <li>d. Incompatible wastes</li> </ul>	
(Permit Sec: 2.3) <b>Operating Practice</b>	7
<ul style="list-style-type: none"> <li>a. Drum Dock Operations</li> <li>b. Industrial Cell Operations</li> <li>c. RCRA Cell Operations</li> <li>d. TSCA Cell Operations</li> <li>e. Truck Washout</li> <li>f. Waste Sampling</li> <li>g. Stabilization and Solidification</li> </ul>	TYPICAL FILE for example only
(Permit Sec: 2.4) <b>Contingency Plan</b>	1
<ul style="list-style-type: none"> <li>a. Preparedness and prevention Plan</li> <li>b. Procedures for using, Inspecting, Repairing and Replacing Facility Emergency Equipment, and Site Inspection.</li> </ul>	
(Permit Sec: 2.5) <b>Respiratory Equipment</b>	1
<ul style="list-style-type: none"> <li>a. Proper use, fit and basic inspection and maintenance of respiratory equipment</li> <li>b. Where and when respiratory equipment is to be used at GMF</li> </ul>	
(Permit Sec: 2.7) <b>Miscellaneous Topics</b>	1
<ul style="list-style-type: none"> <li>a. Record Keeping</li> <li>b. Site Security</li> <li>c. Update of Regulations</li> </ul>	

TYPICAL FILE -  
for example only

## **GMF101 - OPERATING PRACTICE (DRUM DOCK OPERATIONS)**

### **Course Description:**

This course provides basic training for employees who as a part of their duties manage, sample and store drum loads at the Grassy Mountain Drum Management facility. The program provides a basic understanding of the requirements set forth in module III of the site part B permit, and a practical approach of compliance with these requirements. The course materials will be presented in part or as a whole to employees based on their specific job function within the unit. The course is designed to take both a knowledge and skill based approach to the subject Drum Dock Operations.

### **Objectives:**

- A. Waste Identification - provide an understanding of section B, in module III, that refers to the types of waste allowed to be stored in the waste management unit; (e.g. RCRA wastes, CERCLA wastes, and incineration residue wastes). Employee will develop a working knowledge of all RCRA "D listed" waste codes and will know where reference materials may be obtained on all other codes.
- B. Container Condition - provide the employee with an understanding of section C, in module III, regarding the condition of containers, and the requirements to take remedial action if the a container does not meet the criteria as set forth by the permit.
- C. Compatibility of Waste with Containers - provide the employee with an understanding of section D, in module III and the need for waste compatibility with the container in which it is shipped. Introduce the employee to attachments and tables describing container materials compatible with various waste streams.
- D. Management of Containers - provide the employee with an understanding of section E, and related attachments in module III, pertaining to the management of containers in the unit. The employee will understand the time constraints governing the unloading, and treatment of loads as stated in this section, and the precursory requirements of the permit.
- E. Containment - provide the employee with an understanding of section F, and associated attachments, pertaining to containment with in the management unit and the capacity limits in gallons as stated in this section for Topdock 1 (TD01), Topdock 2 (TD02), Sample Pad (SPAD), North Pad (NP01) and South Pad (SP01).
- F. Special Requirements for Ignitable or Reactive Waste - Provide the employee

TYPICAL FILE -  
for example only

with an understanding of section G and attachments of Module III, pertaining to the management of ignitable and reactive wastes as stated in the permit.

- G. Special Requirements for Incompatible Waste - Provide the employee with an understanding of section H and attachments of module III, pertaining to the placement and management of incompatible wastes. The employee will understand the restrictions of this section and the need for documentation in the facility operating record required by R450-8.3.8. (c).
- H. Identification of Location of Containers on Operating Record - Introduce the employee to the facility Operating Record and provide an understanding as to the requirements in Section I in Module III pertaining to listing the location of hazardous waste containers stored within the management unit in the operating record. The employee will understand the specific requirements of this section in relationship to time constraints and documentation.
- I. Inspections - provide the employee with an understanding for the need of inspections in section L module III, and the importance of correcting any conditions identified as a result of the inspections.

Prerequisites: Medical Clearance, OSHA 24 hour Hazwoper, RCRA Modules, Company Overview, and Contingency Plan.

Duration: Approximately 4 hours classroom & 40 hours "hands-on"

Instructor: Area supervisor or another experienced person

**Evaluation:** Written examination, observation during 40 hour "hands-on" training

**APPENDIX 2**  
**TRAINING MATRIX**



## GRASSY MOUNTAIN TRAINING MATRIX

Topic/Module	Operations	Technical	Administrative
Overview	XX	XX	XX
Chemical Terminology, Toxicology and Handling	XX	XX	
Operating Practices	XX		
Contingency Plan	XX	XX	XX
Respiratory Equipment	XX	XX	
Miscellaneous Topics	Varies	Varies	Varies
Response to Groundwater Contamination		XX	